

1 RALPH A. SCHWARTZ PC
2 Ralph A. Schwartz
3 400 S. Seventh Street, Suite 100
4 Las Vegas, NV 89101
Phone: (702) 888-5291
Fax: (702) 888-5292
Email: rschwartz@888law1.com

BROWN & STEDMAN LLP
Edwin B. Brown (Pro Hac Vice Pending)
22342 Avenida Empresa, Suite 125
Rancho Santa Margarita, CA 92688
Phone: (949) 459-5900 Fax: (949) 713-7722
Email: edbrownlaw@gmail.com

Attorneys for Plaintiff Robert Coache

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

13 ROBERT COACHE, An Individual,

15 Plaintiff,

16 | VS.

18 LAS VEGAS METROPOLITAN POLICE
19 DEPARTMENT, CLARK COUNTY,
20 MARC DIGIACOMO, COLIN HAYNES,
NATHAN CHIO, and DOES 1-30,

21 Defendants.

Case No.: 2:21-cv-01334-RFB-BNW

**JOINT MOTION TO EXTEND TIME
FOR PLAINTIFF TO FILE AND
SERVE OPPOSITION TO MOTION TO
DISMISS**

[FIRST REQUEST]

23 Plaintiff Robert Coache (“Plaintiff”), by and through his counsel Ralph A Schwartz,
24 PC, and Brown, Clark, Le, Stedman & Cevallos LLP, and Defendants Clark County, Las
25 Vegas Metropolitan Police Department, Colin Haynes, and Lt. Nathan Chio (“Defendants”),
26 by and through their counsel, Lyssa S. Anderson Esq., and Kaempfer Crowell, submit this

MOTION TO CONTINUE TIME TO FILE OPPOSITION TO MOTION TO DISMISS

1 joint motion to extend time for Plaintiff to file and serve his opposition to Defendants'
2 Motion to Dismiss.

3 Defendants filed and served their Motion to Dismiss on December 6, 2021. The current
4 deadline for Plaintiff to file the opposition to the Motion is December 20, 2021. Plaintiff requests an
5 additional thirty (30) days to file his opposition to the Motion to Dismiss. The requested extension is
6 needed to ensure that Plaintiff has adequate time to adequately respond to the Motion to Dismiss. The
7 extension is also needed due to the upcoming holidays. The requested extension is made in good faith
8 and not for the purpose of delay. This is Plaintiff's first request for an extension to oppose the Motion
9 to Dismiss. The new date for the filing and serving of the opposition would be January 20, 2022.

10
11 Dated: December 7, 2021

RALPH A SCHWARTZ PC

12
13
14 Dated: December 7, 2021

By: /s/ Ralph A. Schwartz, Esq.

Ralph A Schwartz
Counsel for Plaintiff Robert Coache

15
16
17 KAEMPFER CROWELL

18
19
20
21 By: /s/ Lyssa Anderson, Esq.
22 Lyssa Anderson
23 Counsel for Defendants Las Vegas
24 Metropolitan Police Department, Colin
25 Haynes, and Lt. Nathan Chio

26
27
28 IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: December 20, 2021

MOTION TO CONTINUE TIME TO FILE OPPOSITION TO MOTION TO DISMISS